

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on September 23, 2013.

Permit Number: **R30-07900072-2013**
Application Received: **December 22, 2015**
Plant Identification Number: **07900072**
Permittee: **Toyota Motor Manufacturing West Virginia**
Facility Name: **Buffalo Plant**
Mailing Address: **1 Sugar Maple Lane, P.O. Box 600, Buffalo, WV 25033**

Permit Action Number: *MM01* Revised: *June 27, 2016*

| | |
|--------------------|---|
| Physical Location: | Buffalo, Putnam County, West Virginia |
| UTM Coordinates: | 413.518 km Easting • 4,272.153 km Northing • Zone 17 |
| Directions: | The facility lies directly east of WV State Route 62 approximately one (1.0) mile south of Buffalo, WV. |

Facility Description

Toyota Motor manufacturing West Virginia is primarily engaged in the manufacturing of automotive engines and automotive transmissions. As part of this manufacturing process, the plant contains machining, assembly, engine testing, and support operations. To support these operations, the plant is equipped with heating ventilation and air conditioning units, as well as various storage tanks (e.g., gasoline, motor oil, etc.). The SIC code for this facility is 3714.

The purposes of this modification are to increase production levels, for the addition of a new engine firing bench, and to facilitate the addition of two new emergency generators (Source ID: GEN-Pharm and GEN-IS-2). These changes were approved under R13-2062L (increased production levels and new firing bench) and G60-C005C (emergency generators).

Emissions Summary

There are no potential emission changes associated with the increased production levels and new firing bench. The following potential emissions increases are associated with the installation of the new generators:

| Pollutant | Increase in PTE (TPY) |
|-----------------|-----------------------|
| NO _x | 0.02 |
| CO | 0.02 |
| VOC | 0.01 |

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 247.97 tons/year of VOC and 145.98 tons/year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Toyota Motor Manufacturing West Virginia is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

| | | |
|--------------------|-----------------------|---|
| Federal and State: | 45CSR13 | Construction permit. |
| | 45CSR16 | Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. Part 60 |
| | 45CSR30 | Operating permit requirement. |
| | 45CSR34 | Hazardous Air Pollutants. |
| | 40CFR60, Subpart JJJJ | SI RICE NSPS |
| | 40CFR63, Subpart ZZZZ | RICE NESHAP |
| State Only: | None | |

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit (<i>if any</i>) |
|--------------------------------|------------------|--|
| R13-2062L | January 25, 2016 | |
| G60-C005C | July 14, 2015 | |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Increased Production Rates and New Firing Bench

With the change made under R13-2062L (increased production rates and new firing bench), the following changes were made to Section 1.1 (Emission Units).

- The maximum production for Projects #1 and #2 were increased from 550,000 to 900,000 units/year.
- The year constructed and building number were updated for Project #2.
- The building numbers were updated for Project #4.
- The number of units and process types were updated for Project #18.
- The process types were updated for Project #19.

The following changes were made to the existing permit language:

- A new 4 cylinder firing bench (Source: E3S) was added to condition 5.1.5. The role of this bench is QA/QC. Approximately 1 in 125 engines will be pulled from the production line and tested to ensure production quality. The new firing bench is vented to the atmosphere through a roof stack (FB-3) and is uncontrolled. No increase is requested in the aggregate fuel usage limit for all firing benches (Condition 5.1.5(3)).

New Emergency Generators

The new generators were added under G60-C005C (which was included in the revised Attachment B of the permit), and both are subject to 40 C.F.R. 60, Subpart JJJJ. The generators are also subject to 40 C.F.R. 63, Subpart ZZZZ, but according to 40 C.F.R. §63.6590(c), compliance with 40 C.F.R. 60, Subpart JJJJ is sufficient for compliance with 40 C.F.R. 63, Subpart ZZZZ. The descriptions for the generators are as follows:

- A General Motors GM-5.7L 30REZG generator (Source ID: GEN-Pharm) was installed on February 27, 2014. This generator combusts natural gas and is rated at 49 hp. This generator is used for emergency power for a pharmacy/clinic (lighting and equipment).
- A Doosan D14.6L 250REZXB generator (Source ID: GEN-IS-2) was installed on July 21, 2015. This generator combusts natural gas and is rated at 402 hp. This generator is used for emergency power for a computer center.

Both generators were added to section 1.1, and the emission limitations for all emergency generators were updated in condition 7.1.1. The Source ID for existing GEN-IS was updated to GEN-SEC, and the area was updated to read "Security" instead of "Computer Data Center". Appendix B was updated to include the most recent version of the Class II General Permit Registration.

Additionally, Section 10.0 of this permit was added to include all applicable requirements from 40 C.F.R. 60, Subpart JJJJ. These requirements are summarized as follows:

| Condition Number | Summary of Condition | Regulatory Citation | Generator Covered |
|------------------|--|---|------------------------|
| 10.1.1 | Emission standards for engines between 25 and 100 hp. | 45CSR16; 40 C.F.R. §60.4233(d);and Table 1 to 40 C.F.R. 60, Subpart JJJJ | GEN-Pharm |
| 10.1.2 | Emission standards for engines greater than or equal to 100 hp. | 45CSR16; 40 C.F.R. §60.4233(e); and Table 1 to 40 C.F.R. 60, Subpart JJJJ | GEN-IS-2 |
| 10.1.3 | Permittee may not install engines that do not meet the applicable requirements of 40CFR§60.4233 | 45CSR16; 40 C.F.R. §60.4236(c) | GEN-Pharm and GEN-IS-2 |
| 10.1.4 | Permittee must meet emission standards over life of engine | 45CSR16; 40 C.F.R. §60.4234 | GEN-Pharm and GEN-IS-2 |
| 10.1.5 | Requirements for emergency engines | 45CSR16; 40 C.F.R. §60.4243(d) | GEN-Pharm and GEN-IS-2 |
| 10.1.6 | Use of air-to-fuel ratio controller | 45CSR16; 40 C.F.R. §60.4243(g) | GEN-Pharm and GEN-IS-2 |
| 10.1.7 | Purchase of certified engines | 45CSR16; 40 C.F.R. §§60.4243 (a)(1) and 60.4243(b)(1) | GEN-Pharm and GEN-IS-2 |
| 10.1.8 | Applicable general provisions | 45CSR16; 40 C.F.R. §60.4246 | GEN-Pharm and GEN-IS-2 |
| 10.2.1 | Non-resettable hour meter | 45CSR16; 40 C.F.R. §§60.4237(b) and (c) | GEN-Pharm and GEN-IS-2 |
| 10.4.1 | Records of the hours of operation | 45CSR16; 40 C.F.R. §60.4245(b) | GEN-Pharm and GEN-IS-2 |
| 10.4.2 | Records of notifications, maintenance, certified engine documentation, and documentation that the engine meets emissions standards | 45CSR16; 40 C.F.R. §60.4245(a) | GEN-Pharm and GEN-IS-2 |
| 10.5.1 | Annual reporting requirements for engines rated over 100 hp | 45CSR16; 40 C.F.R. §60.4245(e) | GEN-IS-2 |
| 10.5.2 | Records of propane use and possible performance testing. | 45CSR16; 40 C.F.R. §60.4243(e) | GEN-Pharm and GEN-IS-2 |

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.